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May 28, 2021

(Via ECF)

Lorna G. Schofield, U.S.D.J.  
United States District Court Southern District of New York  
500 Pearl Street  
New York, New York 10007  
(212) 805-0288

Re: *Glenda N. Ramirez v. Group Short Term Disability, Long Term Disability and Life Plan for Employees of Z.B. Company, Inc., et. al.*  
Civil Action No.: 1:20-cv-09624(LGS)

Dear Judge Schofield:

This office represents the Defendant Hartford Life Insurance Company (“Hartford”) in the above referenced matter. Pursuant to Rule B(2) of Your Honor’s Individual Rules and Practices for Civil Cases, Hartford respectfully requests a 30 day adjournment of the dates in the Court’s April 9, 2021 Scheduling Order regarding the deadlines for the parties to file their respective motions for summary judgment. (Doc. No. 33). Due to the press of deadlines in other matters in late June and early July as well as the fact that undersigned counsel is scheduled to be out of the office preparing for the Florida Bar Examination on July 16<sup>1</sup>, Defendant requests that the deadlines in the Court’s April 9, 2021 Scheduling Order be adjourned as follows:

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<sup>1</sup> At the time this Court entered the April 9, 2021 Scheduling Order, Counsel for the Defendant was not yet sure if he would sit for the Florida bar examination.

# Robinson+Cole

Lorna G. Schofield, U.S.D.J.

May 28, 2021

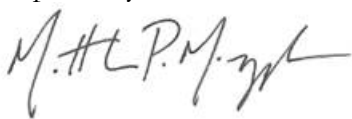
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Motion Papers to Be Filed	Initial Deadline	Requested Extended Deadline
Plaintiff's Motion for Summary Judgment	June 18, 2021	July 19, 2021
Defendant's Opposition to Plaintiff's Motion for Summary Judgment and any Cross-Motion for Summary Judgment	July 16, 2021	August 16, 2021
Plaintiff's Reply in Support of her Motion for Summary Judgment and any Opposition to Defendant's Cross-motion for Summary Judgment	August 6, 2021	September 7, 2021
Defendant's Reply in Further Support of its Cross-Motion for Summary Judgment	August 20, 2021	September 21, 2021

This is Hartford's first request for an extension of the deadlines in the Court's Scheduling Order and Plaintiff consents to the relief requested herein.

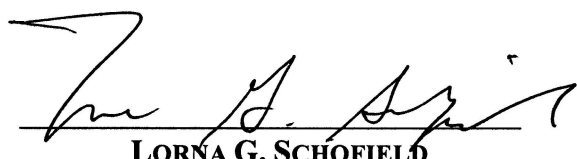
Thank you for your consideration of this matter.

Respectfully submitted,



Matthew P. Mazzola

cc: All Counsel of Record (*via* ECF)



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

The application is **GRANTED**. The parties shall brief their cross-motions for summary judgment according to the following schedule:

By **July 19, 2021**, Plaintiff shall file her motion for summary judgment;  
By **August 16, 2021**, Defendants shall file their opposition to Plaintiff's motion for summary judgment and any cross-motion for summary judgment;

By **September 7, 2021**, Plaintiff shall file her reply in support of her motion for summary judgment and any opposition to Defendants' cross-motion for summary judgment; and  
By **September 21, 2021**, Defendants shall file their reply in support of their cross-motion for summary judgment.

The page limitations outlined in the Court's April 9, 2021, Order (Dkt. No. 33), apply.

Dated: June 1, 2021  
New York, New York